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7 *Attorneys for the Federal Defendant*

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 Adriana Sierra,

11 Plaintiff,

12 v.

13 United States Department of Education;  
Equifax Information Services LLC; and  
Experian Information Solutions, Inc.

14 Defendant.

15 Case No. 2:24-cv-00296-APG-MDC

16 **Stipulation and Order to Extend Time**  
**to File a Response**  
**(First Request)**

17 Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Rule IA 6-1 of  
18 this Court's Local Rules, Plaintiff Adriana Sierra and Federal Defendant United States  
19 Department of Education, through undersigned counsel, hereby stipulate and agree as  
20 follows:

21 Plaintiff filed her complaint on February 12, 2024. ECF No. 1.

22 Plaintiff served Federal Defendant with a copy of the Summons and Complaint on  
23 February 20, 2024. ECF No. 5.

24 The current deadline for Federal Defendant to respond to Plaintiff's Complaint is  
25 April 22, 2024.

26 On April 11, 2024, counsel for Plaintiff and Federal Defendant agreed to a 30-day  
27 extension of time for Federal Defendant to retrieve the information needed to review and  
28 respond to the allegations in Plaintiff's Complaint.

1 Accordingly, the parties, through undersigned counsel, submit this stipulation to a  
2 30-day extension from **April 22, 2024**, to **May 22, 2024**, for Federal Defendant to file a  
3 Response to the Complaint. This is the first request for an extension of time.

4 This stipulated request is filed in good faith and not for the purposes of undue delay.

5 Respectfully submitted this 11th day of April 2024.

6 FREEDOM LAW FIRM, LLC

JASON M. FRIERSON  
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Nevada Bar No. 7709

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8 */s/ Gerardo Avalos*  
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10 Attorneys for Plaintiff

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10 */s/ Virginia T. Tomova*  
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12 U.S. ATTORNEY'S OFFICE  
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13 Attorneys for the Federal Defendant

14 IT IS SO ORDERED:  
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17 Hon. Maximiliano D. Couvillier III  
18 UNITED STATES MAGISTRATE JUDGE  
19 DATED: April 12, 2024  
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